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February 20, 2019

VIA ECF

Joseph A. Dickson
United States Magistrate Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Room 4015
Newark, N.J. 07101

Re: Valley Chabad, et al. v. Borough of Woodcliff Lake, et al.
Case No.: 2:16-08087-JLL-JAD

Your Honor:

The undersigned represents Plaintiffs Valley Chabad, Inc. and Rabbi Dov Drizin ("Plaintiffs") in the above-referenced matter. As per Your Honor's Text Order of January 30, 2019, I am writing to report on the status of the outstanding discovery issues outlined in Plaintiffs' January 29, 2019 letter to the Court.

Since the January 30, 2019 telephone conference with the Court, Plaintiffs have received only a small handful of documents from Defendants despite significant outstanding discovery obligations which Plaintiffs have outlined several times over the past year. To date, Plaintiffs still have not received:

- Responses and Objections to Plaintiffs' First Request for Production of Documents served upon Defendant Rendo;
- Responses and Objections to Plaintiffs' First Request for Production of Documents served upon Defendant Borough;

- Supplemental interrogatory answers in response to Plaintiffs' August 3, 2018 letter;
- Responses and Objections to Plaintiffs' Supplemental Requests for Production of Documents served upon Defendant Borough;
- Responses and Objections to Plaintiffs' Supplemental Requests for Production of Documents served upon Defendant Board;
- Responses and Objections to Plaintiffs' Supplemental Requests for Production of Documents served upon Defendant Rendo;
- Responses and Objections to Plaintiffs' Supplemental Requests for Production of Documents served upon Defendant Paul Bechtel;
- Any documents responsive to requests for production or interrogatories in the manner specified in the ESI order.

Per the February 11, 2019 updated Scheduling Order (Dkt. #59), Defendants' deadline for responses to Plaintiffs' outstanding written discovery requests has been extended to February 21, 2019. If Plaintiffs do not receive written discovery responses by February 21, Plaintiffs intend to file a motion to compel, as discussed during the January 30 conference.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robin N. Pick", is written over a light purple rectangular background.

Robin N. Pick

cc: All counsel of record via ECF